

Federal Defenders
OF NEW YORK, INC.

Southern District
52 Duane Street, 10th Floor
New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

Tamara L. Giwa
Executive Director

Jennifer L. Brown
Attorney-in-Charge

MEMO ENDORSED

December 12, 2024

Via ECF

Honorable Laura Taylor Swain
United States Chief District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. John Gass
24 Cr. 523 (LTS)**

Dear Chief Judge Swain,

I write to respectfully request that the Court adjourn the deadline for defense motions and the next court date for approximately 45 days. Specifically, that the defense motions be due on January 24, 2025 and the conference scheduled the following week or any subsequent date that works for the Court.

The Government by Assistant United States Attorney Elizabeth Espinosa consents to this request. The parties are continuing to discuss a pre-trial resolution of this matter, and would like an opportunity to complete those negotiations before motions are filed.

Given the nature of this request, the defense consents to the exclusion of time under the Speedy Trial Act until the newly-selected date. Thank you for your consideration.

Respectfully submitted,

/s/
Sylvie Levine
Attorney for Mr. Gass
212-417-8729

The foregoing request is granted. Defense motions are due by **January 24, 2025**. The Government is directed to file a letter by **12:00 p.m. on January 29, 2025** regarding the need for an evidentiary hearing as well as its preliminary response to the defendant's motion(s). The next pretrial conference in this case is hereby adjourned to **January 31, 2025 at 11:30 a.m. in Courtroom 17C**. The Court finds pursuant to 18 USC 3161(h)(7)(A) that the ends of justice served by an exclusion of speedy trial computations from today's date through January 31, 2025, outweigh the best interests of the public and the defendant in a speedy trial for the reasons stated herein. DE 14 resolved.

SO ORDERED.

12/13/2024

/s/ Laura Taylor Swain, Chief USDJ.